

REMARKS

Claims 1-24 are in the present application.

In the Office Action dated April 1, 2003, it was noted that the specification originally filed was inadvertently damaged when it was placed in the file wrapper. The Office requested a re-submittal of the patent application as originally filed. Included herewith is a copy of the patent application, as filed.

Claims 1-24 were rejected under 35 USC 103(a) as being unpatentable over Shell et al (hereinafter Shell) in view of Guck. Respectfully, this rejection is traversed.

It is first noted that Applicant discloses and claims a method, a computer, and a memory media for composing a computer message (see for example, claims 1, 8, 10, 15, 20, and 23). As stated in, for example claim 1, the claimed method comprises "presenting a message composition area for entry of an unformatted message" (emphasis added). Claims 10, 15, and 20 recited similar wording. The method of claim 21 states receiving an unformatted message from a user. The memory media of claim 23 comprises means for controlling the computer to receive as unformatted message from a user. Clearly, the method, computer, and memory media of Applicant's claims present or receive an unformatted message.

Regarding Shell, the Office argues that Shell allegedly discloses a content viewing area for the display of content which can be simple text (alleged as unformatted by Office), and content that can be formatted for presentation from selecting from a group of formats.

Regarding Guck, the Office cites and relies on Guck for disclosing creating and reformatting messages by converting messages from one format to another format.

The Office then argues that it would have been obvious to combine Guck into Shell to provide a way to create messages and reformat messages by converting from one format to another format as taught by Guck, incorporated into the selection of a format from a group of formats as taught by Shell. The purported motivation provided by the Office for such a combination of Shell and Guck is to efficiently enable the text created by an author to be converted into other formats suitable for other client users.

It is first noted that Shell discloses a portable computer having a limited content viewing display area having a hypermedia browser executing thereon, and the browser displaying an animated graphic element over the content viewing area when the browser is loading content. Shell is cited and relied upon by the Office for allegedly disclosing a content viewing area for the display of content which can be simple text (alleged as unformatted by Office), and content that can be formatted for presentation from selecting from a group of formats. The Office admits that Shell does not explicitly disclose message composition and converting the message to form a formatted message with format tags of one of the output formats.

Contrary to the Office's arguments of record, it is respectfully submitted that Shell does not disclose a content viewing area for the display of unformatted messages, as claimed by Applicant. Instead, Shell discloses a hypervideo browser having a content viewing area. The content displayed in the browser is in fact formatted for display therein. Shell does not disclose presenting a message area for entry of an unformatted message. In response to the Office's statement that Shell does not explicitly disclose "message composition", Applicant submits that Shell does not appear to disclose an entry area for composition of a message or any other type of textual message. The disclosed

browser has a content viewing area for displaying formatted hypermedia content and an icon indicating the loading of the content.

Thus, Shell does not appear to disclose presenting a message area for entry of an unformatted message, as claimed by Applicant.

Furthermore, Shell does not appear to disclose that the content can be formatted for presentation by a message format selector for selecting an output from a plurality of formats, as claimed by Applicant. Shell appears to disclose, at most, content for presentation that may be formatted in a number of different formats, the particular format of the presented content is selected from a group consisting of HTML, text, SGML, etc. as stated in claim 10 of Shell. That is, the format of the claimed content is one of the type listed in the Markush group recited in the claim. Shell does not disclose "presenting a message format selector for selecting an output format from a plurality of formats" (see Applicant's claim 1). There is no disclosure in Shell that the format of the presented content is selectable by a presented message format selector as claimed. The Office has apparently and mistakenly attributed functional meaning to the claim format language of Shell, contrary to the well-known and established understanding of Markush type claims.

Accordingly, Shell does not in fact disclose that for which it was cited and relied upon by the Office.

It is further noted that Guck discloses a methodology wherein the message provided for reformatting is initially provided as formatted. That is, the message composer provides the message formatted in a first format, and the message is reformatted into a second format. This is contrary to Applicant's claimed method, computer, and memory media where an unformatted message is presented or received.

Therefore, Shell, Guck, and the combination thereof do not disclose presenting a message area for entry of an unformatted message, as claimed by Applicant. Even if Shell and Guck were combined (not admitted as feasible by Applicant), the combination would not result in Applicant's claimed method, computer, and memory media, or render the same as obvious. Neither Shell nor Guck, and thus the combination thereof, disclose or suggest presenting or converting unformatted messages.

In fact neither Shell nor Guck even appear to be concerned with or appreciate Applicant's problem of alleviating the message composer from the burden of preparing a formatted computer message. This is the case since Shell present hypermedia content (i.e., formatted) and Guck converts from one format to another format.

Accordingly, it is respectfully submitted that Shell and Guck fail to render claims 1, 10, 15, 20, 21, and 23 as obvious under 35 USC 103(a) for at least the reasons stated above. Reconsideration and allowance of claims 1, 10, 15, 20, 21, and 23 are requested.

Claims 2-7 depend from claim 1; claims 11-14 depend from claim 10; claims 16-19 depend from claim 15; claim 22 depends from claim 21; and claim 24 depends from claim 23. It is respectfully submitted that each of the dependant claims are patentable over Shell and Guck for at least the reasons stated above regarding claims 1, 10, 15, 20, 21, and 23. Accordingly, reconsideration and allowance of claims 2-7, 11-14, 16-19, 22, and claim 24 are requested.

Regarding the rejection of claim 8, it is respectfully submitted that the Office admits that Shell and Guck do not explicitly disclose "editing said formatted messages to form a revised formatted message", and "providing the revised message to said computer file", as claimed by Applicant. However, the Office fails to provide a logical line of

reasoning of how the claimed subject matter is even suggested by the combination of Shell and Guck. The Office relies on the same purported motivation discussed above.

It is not seen where or how Shell and Guck disclose or suggest Applicant's claimed "editing said formatted messages to form a revised formatted message", and "providing the revised message to said computer file". Neither Shell nor Guck appear to be concerned with editing messages. Again, Shell discloses presenting hypermedia content and Guck discloses converting (i.e., not editing) between one format and another format.

Accordingly, it is respectfully submitted that Shell and Guck fail to render claim 8 as obvious under 35 USC 103(a) for at least the reasons stated above. Reconsideration and allowance of claim 8 is requested.

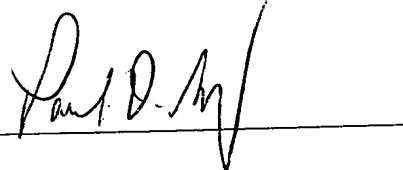
Claim 9 depends from claim 8. It is respectfully submitted that claim 9 is patentable over Shell and Guck for at least the reasons stated above regarding claim 8. Accordingly, reconsideration and allowance of claim 9 is requested.

Serial No.: 09/471,429
Art Unit: 2176

Therefore, it is respectfully submitted that claims 1-24 are patentable over the cited and relied upon Shell and Guck. Therefore, withdrawal of the 35 USC 103(a) rejection of claims 1-24 and the allowance of claims 1-24 is earnestly solicited.

Respectfully submitted,

Dated: 7-1-03

A handwritten signature in dark ink, appearing to read "Paul D. Greeley", is written over a horizontal line.

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